REMARKS/ARGUMENTS

In view of the following remarks, reexamination and reconsideration of this application, withdrawal of the rejections, and formal notification of the allowability of all claims as presented are earnestly solicited. As detailed in the Office Action mailed June 3, 2004, Claims 1-6 are pending, wherein Claims 1-6 have been rejected. In response to the Office Action, the Applicant submits the remarks presented below. No new matter has been added. Accordingly, in light of these remarks, it is believed that the claims define patentable subject matter over the prior art cited by the Examiner and notice to such effect is requested at the Examiner's earliest convenience.

Claim Rejections – 35 U.S.C. §103

Claims 1-6 were rejected in the Office Action as being unpatentable over U.S. Patent No. 6,158,333 to Honkalampi *et al.* The Applicant respectfully traverses these rejections.

The Honkalampi '333 patent discloses a method and an apparatus for calendering a fiber web passing through an extended and heated nip, wherein the nip is formed on one side by a cylindrical heated roll and on the other side by a flexible tubular jacket which is pressed against the heated roll by a concave load shoe. The heated counter-roll 22 is arranged on a lever 95 having a pivot point 96 and a hydraulic piston arrangement 94 acting on the lever 95 for moving the heated roll 22 into and away from the nip 1 about the pivot point 96.

In contrast, Claim 1 of the present invention particularly claims **a method** of minimizing vibration in a press roll forming a press nip only with an opposing roll, with each of the rolls having a rotational axis, wherein such a method comprises applying a force to one end of a suspension arm having a medially-disposed pivot and the press roll operably engaged with the other end thereof. The force is configured to act about the pivot so as to cause the suspension arm to impart a linear load through the press roll onto a fiber web passing through the press nip, wherein the linear load being oriented through the rotational axes of the press roll and the opposing roll. Such a method further specifies that **the pivot is adjusted in substantially parallel relation to the linear load such that a mounting line defined by the pivot and the**

rotational axis of the press roll is maintained in substantially perpendicular relation to the linear load to thereby minimize vibration in the press roll.

As such, the Applicant submits that the Honkalampi '333 patent **does not** teach or suggest that the pivot point 96 is movable or adjustable. Accordingly, the pivot point 96 disclosed by the Honkalampi '333 patent **cannot be adjusted** in substantially parallel relation to the linear load, as particularly required by currently pending Claim 1. Further, the Applicant notes, as shown in FIG. 1 of the Honkalampi '333 patent, that the pivot point 96 is disposed on a different plane with respect to the lever 95 than the rotational axis of the counter-roll 22. Accordingly, the pivot point 96 disclosed by the Honkalampi '333 patent **cannot be adjusted** in substantially parallel relation to the linear load **such that a mounting line defined by the pivot and the rotational axis of the press roll is maintained in substantially perpendicular relation to the linear load**," as particularly claimed in pending Claim 1. That is, as shown in FIG. 1 of the Honkalampi '333 patent, the linear load extends between the rotational axes of the counter-roll 22 and the shoe roll 10, while the mounting line extends between the pivot point 96 and the rotational axis of the counter-roll 22. As a result, in the configuration shown in FIG. 1 of the Honkalampi '333 reference, the mounting line is **not** substantially perpendicular to the linear load, as particularly claimed in Claim 1.

The Applicant also notes that Claim 1 of the present invention specifies a relationship between **the pivot** for the suspension arm and the linear load and **not** between **the suspension arm** and the linear load, as asserted in the rejection of Claim 1 in the Office Action.

As such, the Applicant submits that the Honkalampi '333 reference **does not** teach or suggest **adjusting the pivot in substantially parallel relation to the linear load such that a mounting line defined by the pivot and the rotational axis of the press roll is maintained in substantially perpendicular relation to the linear load to thereby minimize vibration in the press roll**, as particularly claimed in pending Claim 1 of the present invention. The Applicant therefore submits that Claims 1-6 are patentable over the Honkalampi '333 patent and requests withdrawal of these rejections.

Conclusion

In summary, the Honkalampi '333 reference does not teach, suggest, or provide motivation for the embodiments of the present invention, as claimed in Claim 1. Accordingly, it is submitted that the present invention, as defined by the pending claims, is patentable over the prior art cited by the Examiner. As such, for the reasons set forth above, Claims 1-6 now pending are believed to be in condition for immediate allowance. Accordingly, notice to such effect is respectfully requested at the Examiner's earliest opportunity.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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I hereby certify that this paper is being facsimile transmitted to the US Patent and Trademark Office at Fax No. (703) 872-9306 on the date shown below.

Tracey S. Wright — 8/17/04

Tracey S. Wright — Date